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ENERGY WATER INFORMATION GOVERNMENT

Centel Corporation
Beatrice MGP Site

B&V Project 143927.412
B&V File A04B
June 4, 2008

Kevin Larson
U.S. Environmental Protection Agency - Region 7
Superfund Division
901 North 5th Street
Kansas City, KS 66101



Subject: Proposed Changes to the EE/CA Work Plan

Dear Kevin:

As you are aware from a discussion with Brian Wiedower, gaining access to BNSF Railway Company (BNSF) property east of the Beatrice former manufactured gas plant (MGP) Site has been difficult. Because of these issues, several of the soil probes, groundwater probes, and monitoring wells proposed in the Engineering Evaluation/Cost Analysis (EE/CA) Work Plan will not be able to be advanced. This addendum to the Work Plan presents rationale for alternate probe and well locations so that the EE/CA investigation can proceed. Tables 1 and 2 are adapted from tables in the Work Plan and provide rationale for location changes.

Soil Probes

Originally proposed along the eastern boundary of the MGP Site and on BNSF property, soil probes SP-109, SP-110, and SP-111 will be advanced on City of Beatrice property at the locations shown on Figure 1. Probe SP-113 will not be advanced; however, background soil samples originally planned at this location will be obtained from the boring for monitoring well MW-07 (Table 2).

Groundwater Probes

Groundwater probes GWP-109, GWP-110, and GWP-111 were originally proposed to be installed on BNSF property between the Site and historical oil storage facilities to determine the presence of any petroleum hydrocarbon contamination upgradient of the MGP Site. These probes will be re-located to the eastern edge of the City of Beatrice property as shown on Figure 2. If property access can be obtained from the current owner (Custom Fixtures, Inc.), an additional groundwater probe (GWP-112) is proposed east of the BNSF property to determine the presence of any groundwater contamination upgradient of the BNSF and MGP site properties.

Monitoring Wells

Rather than on BNSF property, wells MW-06 and MW-07 will be installed on City property further east of the Site to define groundwater flow and upgradient conditions. The revised monitoring well locations are shown on Figure 2. As delineated in the Work Plan, the exact monitoring well locations will be based on the groundwater probe data collected during the initial phase of the EE/CA investigation, and additional wells may be proposed. Because existing well MW-02 is located on BNSF property, an additional well may be added on Site at the eastern edge of City-owned property between wells MW-02 and MW-03 depending on the groundwater probe data.

Based on your concurrence, we will proceed with the EE/CA field investigation activities as modified in this letter. The EPA will be provided appropriate notice for the scheduling of the field activities. It is expected that this work will occur in July/August 2008 based on the availability of subcontractors.

We would like to note that not being able to collect soil and groundwater data, as proposed in the approved EE/CA Work Plan, may prevent determining the impact of non-MGP contamination associated with the historical oil storage facilities located east and upgradient of the original gas plant property.

You are welcome to call Mr. Brian Wiedower, the Centel project coordinator, at (913) 315-8631, or Barbara Butler at (913) 458-6547 if you have any questions regarding these proposed changes to the EE/CA Work Plan.

Very truly yours,

BLACK & VEATCH

A handwritten signature in black ink, appearing to read 'M. Snyder', is positioned above the printed name.

Mark G. Snyder, BCEE, D.WRE
Senior Environmental Engineer and Project Manager

Enclosures

cc: (all with enclosures)
Laurie Brunner, NDEQ
Brian Wiedower, for Centel Corporation
Ed Clement, Embark Corporation
Neal Niedfeldt, City of Beatrice
Scott Young, Polsinelli Shalton Flanigan Suelthaus PC
John Chapman, Sprint Corporation
Barbara Butler, Black & Veatch
Project File

TABLE 1
EE/CA SOIL PROBE LOCATIONS
(Adapted from Table 4-2 of the EE/CA Work Plan)

EE/CA Work Plan Location Designation	Location Description	Estimated Depth	Purpose	Samples for Chemical Analysis ⁽¹⁾
SP-101, SP-102, SP-103, SP-104	Southern edge and south of the Site.	20 to 35 feet (top of bedrock)	Delineate soil contamination and DNAPL along the southern Site boundary; determine depth to bedrock.	1 to 6, 6 to 12, and 12 foot to the top of the groundwater surface or bedrock.
SP-105, SP-106	On Site	20 to 35 feet (top of bedrock)	Delineate extent of DNAPL on Site and determine depth to bedrock. SP-105 will also be used for confirmation of EC probe EC-103.	No samples collected.
SP-107, SP-108	On Site along western edge.	20 to 35 feet (top of bedrock)	Delineate soil contamination and DNAPL on Site; determine depth to bedrock.	1 to 6, 6 to 12, and 12 foot to the top of the groundwater surface or bedrock.
SP-109, SP-110, SP-111	Eastern edge of Site On Site at eastern edge of City-owned property.	20 to 35 feet (top of bedrock)	Determine soil conditions between suspected upgradient contaminant sources and the Site Determine soil conditions on Site at the eastern edge of City-owned property; determine depth to bedrock.	1 to 6, 6 to 12, and 12 foot to the top of the groundwater surface or bedrock.
SP-112	Inside the southern former gas holder structure, based on historical information.	8 to 20 feet (base of structure)	Evaluate source material and contaminated soil/debris, if present; evaluate the depth of the structure.	1 to 6, 6 to 12, and 12 foot to the base of the structure.
SP-113	Northeast of Site on City right-of-way along Market Street	20 to 35 feet (top of bedrock)	Determine upgradient/background soil conditions and depth to bedrock; confirmation for EC probe EC-107	1 to 6, 6 to 12, and 12 foot to the top of the groundwater surface or bedrock.
Note: ⁽¹⁾ No soil samples will be collected below the groundwater table. Soil samples will be analyzed for BTEXs, PAHs, selected metals, and cyanide. Samples of source material will be additionally collected and analyzed for RCRA hazardous waste characteristics (reactivity, corrosivity, and ignitability). Up to six additional probes will be advanced and sampled as necessary to define the extent of soil contamination based on onsite laboratory data results.				

TABLE 2
RATIONAL FOR PROPOSED MONITORING WELLS
(Adapted from Table 4-3 of the EE/CA Work Plan)

Proposed Well Location	Proposed Location	Rational
MW-04	Southwest portion of the Site	Location to monitor the area of suspected downgradient contamination.
MW-05	Western edge of the Site	Location to monitor west edge of the groundwater plume near the Big Blue River.
MW-06	Southeast of the Site	Location to monitor upgradient, suspected contamination conditions prior to contact with Site and establish groundwater flow direction.
MW-07	Northeast of the Site	Location to monitor upgradient, suspected contamination conditions prior to contact with Site and establish ground water flow direction. Soil samples for chemical analysis (BTEXs, PAHs, selected metals, cyanide) will also be collected from this boring at the following intervals (1 to 6, 6 to 12, 12 foot to the top of the groundwater surface or bedrock).
Note: The actual number and locations of the monitoring wells will be determined based on EC, soil, and groundwater probing data collected during the EE/CA investigation.		



